

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA**

JONATHAN RIVERA-PIEROLA,

*Plaintiff,*

v.

BOARD OF REGENTS FOR THE  
OKLAHOMA AGRICULTURAL AND  
MECHANICAL COLLEGES; STATE OF  
OKLAHOMA *ex rel.* OKLAHOMA  
STATE UNIVERSITY; and ST.  
MATTHEWS UNIVERSITY, INC.,

*Defendants.*

Civil Action No.: 5:21-cv-00616-PRW

**PLAINTIFF'S FINAL EXHIBIT LIST**

COMES NOW, Plaintiff, Jonathan Rivera-Pierola ("Plaintiff"), by undersigned counsel, and hereby offers the following list of exhibits to be used in the trial of this case:

**EXHIBITS-EXPECTED TO BE USED**

<b>No.</b>	<b>Description</b>	
1.	VCS 7733 Small Animal Community Practice Syllabus, Revised: April 2019	Plaintiff 001-007
2.	Handwritten letter from Dr. Gaby Verburgh Hoffmann on St. Matthew's University Stationary	Plaintiff 008
3.	Plaintiff's Oklahoma State University Center for Veterinary Health Sciences, Evaluator: Grade Report Administrator-Final Grade Report, Activity: VCS 7743 Small Animal Internal Medicine, Period: Rotation 07-Class of 2020, Dates of Activity: 09/09/2019 to 09/29/2019	Plaintiff 009-011
4.	Plaintiff's Oklahoma State University Center for Veterinary Health Sciences, Evaluator: Grade Report Administrator-Final Grade Report, Activity: VCS 7933 Hospital Based Theriogenology, Practice, Period: Rotation 08-Class of 2020, Dates of Activity: 09/30/2019 to 10/20/2019	Plaintiff 012

5.	Plaintiff's Oklahoma State University Center for Veterinary Health Sciences, Evaluator: Grade Report Administrator-Final Grade Report, Activity: VCS 7723 Equine Medicine, Practice, Period: Rotation 09-Class of 2020, Dates of Activity: 10/21/2019 to 11/10/2019	Plaintiff 013-014
6.	Plaintiff's Oklahoma State University Center for Veterinary Health Sciences, Evaluator: Grade Report Administrator-Final Grade Report, Activity: VCS 7783 Zoological Medicine Elective, Practice, Period: Rotation 10-Class of 2020, Dates of Activity: 11/11/2019 to 12/01/2019	Plaintiff 015-017
7.	Plaintiff's Oklahoma State University Center for Veterinary Health Sciences, Evaluator: Grade Report Administrator-Final Grade Report, Activity: VCS 7703 Small Animal ICU/EMS, Practice, Period: Rotation 11-Class of 2020, Dates of Activity: 12/02/2020 to 12/22/2019	Plaintiff 018-019
8.	Plaintiff's Oklahoma State University Center for Veterinary Health Sciences, Evaluator: Grade Report Administrator-Final Grade Report, Activity: VCS 7763 Food Animal Medicine, Practice, Period: Rotation 12-Class of 2020, Dates of Activity: 12/23/2020 to 01/20/2020	Plaintiff 020-021
9.	Plaintiff's Oklahoma State University Center for Veterinary Health Sciences, Evaluator: Grade Report Administrator-Final Grade Report, Activity: VCS 7713 Radiology, Practice, Period: Rotation 13-Class of 2020, Dates of Activity: 01/21/2020 to 02/09/2020	Plaintiff 022
10.	Plaintiff's Oklahoma State University Center for Veterinary Health Sciences, Evaluator: Grade Report Administrator-Final Grade Report, Activity: VCS 7733 Small Community Practice, Period: Rotation 14-Class of 2020, Dates of Activity: 02/10/2020 to 03/01/2020	Plaintiff 023-024
11.	Plaintiff's Oklahoma State University Center for Veterinary Health Sciences, Evaluator: Grade Report Administrator-Final Grade Report, Activity: VCS 7753 Small Animal Surgery, Period: Rotation 15-Class of 2020, Dates of Activity: 03/02/2020 to 03/22/2020	Plaintiff 025-027
12.	Community Practice "Expectations"	Plaintiff 028-029
13.	Community Practice Cases from 02/10/20 to 02/28/20	Plaintiff 030-031
14.	Treatment Sheets done by 7:30 a.m. for Canine, Papa	Plaintiff 032-035

15.	Bloodwork report for Canine, Daphne	Plaintiff 036-037
16.	Pictures of UVIS, clinical program used for OSU, showing contact information for owner of Daphne, Tracy Kreiter, in system but no contact information for Jim who brought Daphne into the clinic	Plaintiff 038-039
17.	Email from Paul DeMars, DVM, DABVP K9/Fe, Community Practice, Oklahoma State Center for Veterinary Health Sciences to Plaintiff, dated: March 26, 2020	Plaintiff 040
18.	Community Practice Rotation, Hospitalized Patient Responsibilities	Plaintiff 041
19.	Plaintiff's rebuttal to allegations and statements in Community Practice Evaluation 2-10-20 to 3-1-20	Plaintiff 042-046
20.	VCS 7843 Revised Course Syllabus Covid-19 Outbreak Emergency Plan, Dated: March 20, 2020	Plaintiff 047-050
21.	Letter from Margi Gilmour, DVM, DACVO, Associate Dean for Academic Affairs for Oklahoma State University College of Veterinary Medicine to Plaintiff, Dated: March 23, 2020	Plaintiff 051
22.	Plaintiff's grade sheet for Anesthesia (last rotation before dismissal) 3-23-20 to 4-12-20	Plaintiff 052-053
23.	Plaintiff's Appeal Letter to Dr. Carlos Risco, DVM, DACT, Dean of the College of Veterinary Medicine of Oklahoma State University, sent March 29, 2020	Plaintiff 054-055
24.	Letter from Margi Gilmour, DVM, DACVO, Associate Dean for Academic Affairs for Oklahoma State University College of Veterinary Medicine to Plaintiff, Dated: April 6, 2020	Plaintiff 056
25.	Emails between Professor Dr. Stefano Di Concetto and students of Anesthesia Rotation 16 including Plaintiff, Subject: Early Termination of Anesthesia Rotation, Dated: April 10, 2020	Plaintiff 057-061
26.	Emails between Professor Dr. Stefano Di Concetto and Plaintiff, Subject: Anesthesia Rotation, Dated: April 20, 2020	Plaintiff 062-063
27.	Letter from Margi Gilmour, DVM, DACVO, Associate Dean for Academic Affairs for Oklahoma State University College of Veterinary Medicine to Plaintiff, Dated: April 21, 2020	Plaintiff 064
28.	Letter from Dr. Leslie A. Zebel, PhD, Psychologist to Whom it may concern, Dated: June 1, 2020	Plaintiff 065-066
29.	St. Matthew's University School of Veterinary Medicine Student Handbook (Revised Spring 2013)	Plaintiff 067-103
30.	St. Matthew's University School of Veterinary Medicine Student Handbook (Revised Fall 2019)	Plaintiff 104-146

31.	Oklahoma State University College of Veterinary Medicine Student Handbook 2019-2020	Plaintiff 147-188
32.	Plaintiff's Medical Records from Dr. Edward Zawadzki	Plaintiff 189-199
33.	Plaintiff's Medical Records from Dr. Leslie A. Zebel	Plaintiff 200-208
34.	Plaintiff's Invoices from St. Matthew's University (Fall 2019 to Summer 2020)	Plaintiff 209-214
35.	Plaintiff's Statements from St. Matthew's University (September 1, 2019, January 1, 2020 and May 1, 2020)	Plaintiff 215-217
36.	Plaintiff's Furniture Rental Agreement	Plaintiff 218-219
37.	Plaintiff's Internet Invoice from AT&T	Plaintiff 220-221
38.	Plaintiff's Apartment Rental Autopay Change Notification	Plaintiff 222-223
39.	Plaintiff's Receipt of Utility Payments to the City of Stillwater, Oklahoma	Plaintiff 224
40.	April 30, 2020, Audio recording between Plaintiff and Dr. Di Concetto	Plaintiff 225
41.	Plaintiff's invoices from St. Matthew's University (Spring 2017 to Summer 2019)	Plaintiff 226-234
42.	Plaintiff's Rental Agreement for Cayman Island apartment from November 1, 2017 to October 21, 2018	Plaintiff 235-238
43.	Plaintiff's Rental Agreement for Cayman Island apartment from December 1, 2018 to August 30, 2019	Plaintiff 239-242
44.	Bank statements showing rent payment of Plaintiff's Cayman Island Apartments	Plaintiff 243-282
45.	Bank statements showing deposits for living expenses	Plaintiff 283-295
46.	Plaintiff's Patient Receipts from Dr. Edward Zawadzki, of Lighthouse Health Group	Plaintiff 296-301
47.	All deposition transcripts	
48.	Enlargements of any exhibits	
49.	Demonstrative exhibits	
50.	Rebuttal exhibits	

51.	Any additional documents identified or determined (through the remainder of the discovery period) to be relevant and reliable regarding the claims and/or defenses	
52.	Defendant the Board of Regents for the Oklahoma Agricultural and Mechanical Colleges and Oklahoma State University's Response to Plaintiff's First Set of Interrogatories	
53.	Defendant the Board of Regents for the Oklahoma Agricultural and Mechanical Colleges and Oklahoma State University's Response to Plaintiff's First Set of Requests for Production of Documents	

DATED this 30th day of June, 2023.

Respectfully submitted,

**THE BACH LAW FIRM, LLC**

/s/ Jason J. Bach

JASON J. BACH

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*Attorneys for Plaintiff Jonathan Rivera-Pierola*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 30th day of June, 2023, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrant:

Clinton W. Pratt  
Gaylan Towle II  
Board of Regents for the Oklahoma  
Agricultural and Mechanical Colleges  
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Attorneys for Defendants Board of Regents and  
the State of Oklahoma *ex rel.* Oklahoma State University

*/s/ Jason J. Bach*  
\_\_\_\_\_  
Jason J. Bach